

REMARKS/ARGUMENTS

Claim rejections 35 USC § 103

Claims 1, 7-14, 16-17, 20-21, 23, 26 and 28-35 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Seager (US Patent No. 5,235,561) (hereinafter Seager) in view of Granberg (U.S. 2003/0112225 A1) (hereinafter Granberg) and Mosgrove et al. (U.S. Patent No. 6,317,313 B1) (hereinafter Mosgrove). The Applicants respectfully traverse the rejection.

Independent Claim 1 recites a limitation whereby a first keypad slider and a second keypad slider slide relative to the display/processor module, as claimed. Accordingly, independent Claim 1 recites a limitation where there are two slideable portions, the first keypad slider and the second keypad slider, and a main body display/processor. Moreover, independent Claim 1 recites a limitation whereby the display/processor module adjusts the visible area of the single piece display relative to the position of the first keypad slider and relative to the position of the second keypad slider, as claimed. As such, the size and the visible portion of the single piece display is adjusted according to the relative position of the first and the second slideable keypads.

Seager discloses a main body member that includes a display and telephone control buttons (see Seager, col. 2, lines 12-15) and second main

body member that includes telephone dialing buttons (see Seager, col. 2, lines 14-15) wherein the two members may be separated (see Seager, col. 2, line 33). Seager further discloses that the interior joining member is slideable and telescopically joins the two main members (see Seager, col. 2, lines 38-40).

The rejection admits that Seager does not expressly disclose that a keypad slider would cover a display when in a closed position and the rejection relies on Granberg to show this limitation. In order to show the motivation for combining Seager with Granberg the rejection relies on Granberg stating that the keypad slider is to protect the display (see Granberg, page 2, paragraph 15). The Applicants respectfully submit that combining Granberg with Seager would render Seager inoperable because having slideable keypads to protect the display in closed position would hide the display of the wristwatch, rendering the wristwatch inoperable as a watch.

Moreover, Seager discloses an interior joining member that is slideable and telescopically joins the two main members. Combining Granberg with Seager would further render the operation of the wristwatch as disclosed inoperable. Replacing the interior joining member that is slideable and telescopically joins the two members with a display, renders the slideable and telescopically joining member property inoperable since a single piece display cannot be slideable and telescopically join two members. As such, combining

Granberg with Seager would further render the operation of the wristwatch as disclosed by Seager inoperable.

Furthermore, the Applicants respectfully submit that Seager alone or in combination with Granberg and Mosgrove does not disclose a limitation whereby the display/processor module adjusts the visible area of the display relative to the position of the first keypad slider and relative to the position of the second keypad slider, as claimed.

The rejection relies on Mosgrove to teach sliders with keypads wherein they permit viewing a substantial portion of the display through the first transparent window, as claimed. The references are incompatible when combined in the claimed fashion and would not realize the claimed embodiment when combined. Mosgrove discloses that the cover has a larger window permitting a user to view a substantial portion of the screen in place of the keypad (see Mosgrove, col. 5, lines 44-51). Accordingly, in order to view a substantial portion of the display, the keypad must necessarily be removed according to Mosgrove. Accordingly, Mosgrove does not disclose that the sliders have keypads and wherein they permit viewing a substantial portion of the display, as claimed but rather discloses that in order to permit viewing a substantial portion of the display the keypads must be removed. As such,

Mosgrove does not teach sliders with keypads that permit viewing a substantial portion of the display, as claimed.

Accordingly, Seager alone, or in combination with Granberg and Mosgrove does not render the recited limitations of independent Claim 1 obvious, under 35 U.S.C. 103(a). Independent Claims 17, 19, 21 and 23 recite limitations similar to that of independent Claim 1 and are patentable for the same reasons. Dependent Claims are patentable by virtue of their dependency.

Moreover, regarding Claim 10 and 21, the rejection equates conversion of speech information between digital and analog states to voice recognition, as claimed. The Applicants respectfully disagree because voice recognition recognizes some sequence of words from some sound input whereas conversion of speech information between digital and analog states merely converts one form of signal to another. As such, Granberg does not disclose voice recognition, as claimed.

Furthermore, regarding Claim 26 the rejection equates dialing and control buttons within a wristwatch (see Seager, Abstract) to a display orientation controller, as claimed. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to

one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - §2143.03 for decisions pertinent to each of these criteria." See MPEP 2100-134. The Applicants do not understand disclosure of dialing and control buttons to explicitly teach display orientation controller, as claimed.

As to Claim 28, Granberg discloses that the flexible cover is coupled to the display. Granberg, however, fails to explicitly disclose the keypad slider optically couples to the display, as claimed.

As such, allowance of Claims 1, 7-14, 16-17, 20-21, 23, 26 and 28-35 is earnestly solicited.

Independent Claim 19 was rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Seager in view of Granberg and Mosgrove and Iwata et al (U.S. Patent No. 6,535,749 B1) (hereinafter Iwata). The Applicants respectfully traverse the rejection. The Applicants respectfully submit that

independent Claim 19 recites limitations similar to that of independent Claim 1 and is therefore patentable for the same reasons. The rejection admits that the combination of Seager, Granberg and Mosgrove does not disclose a line selection driver, as claimed. In order to remedy the failure of Seager, Granberg and Mosgrove the rejection relies on Iwata. The Applicants do not understand Iwata to remedy failures of Seager, Granberg and Mosgrove discussed above. As such, allowance of independent Claim 19 is earnestly solicited.

Claims 5 and 15 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Seager in view of Granberg and Mosgrove as applied to Claims 1, 7-14, 16-17, 20-21, 23, 26 and 28-35 above, and further in view of McIntyre et al. (U.S. Patent No. 6,549,194 B1) (hereinafter McIntyre). The Applicants respectfully traverse.

Claims 5 and 15 depend from independent Claim 1 and are patentable over the cited combination at least for the same reasons that Claim 1 is patentable. The Applicants do not understand McIntyre to remedy the failures of Seager, Granberg and Mosgrove as discussed above. Moreover, the rejection admits that Seager, Granberg and Mosgrove do not teach a display orientation controller, as claimed. McIntyre discloses that a large number of possible numerical key locations are provided on the display (see McIntyre, col. 3, lines 29-30) and that this arrangement of components is shown in Figure 1 (see

McIntyre, col. 3, lines 41-42). Accordingly, McIntyre discloses arrangement of key locations and not a display orientation controller for controlling orientation (e.g., landscape or portrait), as claimed by Claim 5. Additionally, the Applicants do not understand the cited portion of McIntyre to teach or suggest a line selection driver, as claimed by Claim 15.

Claims 6 and 27 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Seager in view of Granberg and Mosgrove as applied to Claims 1, 7-14, 16-17, 20-21, 23, 26 and 28-35 above, and further in view of England (U.S. Patent No. 6,483,445 B1) (hereinafter England). The Applicants respectfully traverse because Claims 6 and 27 are patentable by virtue of their dependency.

The rejection admits that Seager, Granberg and Mosgrove do not teach a keypad slider electrically coupled to a display/processor module by a flexible ribbon connector. The rejection relies on England to overcome this failure. England, however, does not remedy the failure of Seager, Granberg and Mosgrove as discussed above. As such, the addition of England to the combination of Seager, Granberg and Mosgrove still does not teach all the recited limitations of Claims 6 and 27. As such, allowance of Claims 6 and 27 is earnestly solicited.

For the above reasons, Applicants request reconsideration and withdrawal of these rejections under 35 U.S.C. §103.

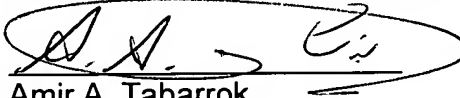
CONCLUSION

In light of the above listed remarks, reconsideration of the rejected claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 1, 5-17, 19-21, 23 and 26-35 overcome the rejections of record and, therefore, allowance of Claims 1, 5-17, 19-21, 23 and 26-35 is earnestly solicited.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Dated: June 22, 2006

Respectfully submitted,
WAGNER, MURABITO & HAO LLP

A handwritten signature in black ink, appearing to read 'Amir A. Tabarrok', is enclosed within a hand-drawn oval.

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